

RETURN DATE: APRIL 18, 2017

: SUPERIOR COURT

EDWARD BARRON, CONSERVATOR OF THE  
PERSON AND ESTATE OF D.T.  
AND JONATHAN CONETTA  
PLAINTIFFS

V.

: J.D. OF FAIRFIELD  
: AT BRIDGEPORT

BRUCE J. BEMER and WILLIAM TREFZGER  
DEFENDANTS

: APRIL 5, 2017

**MOTION FOR PRE-JUDGMENT DISCLOSURE OF PROPERTY AND ASSETS**

Pursuant to General Statutes § 52-278n, the applicant-plaintiffs move that the respondent-defendants be ordered to disclose the existence, location and extent of their interest in any and all sufficient, tangible or intangible real or personal property, including but not limited to general and tangible accounts, bank accounts, accounts receivable, individual retirements accounts, shares of stocks, bonds, partnership interests, business ownership, cash on hand, notes, bills, debts, obligations and liabilities in whatever form owing, choses in action, and/or tax refunds, or any of them to which the respondent-defendants may be entitled, or transferred within the last 90 days, to secure judgment, interest and costs in an amount not to exceed the sum of \$10,000,000.

The applicant-plaintiffs will demonstrate upon a hearing, that there is probable cause sufficient to obtain the remedies sought against the respondent-defendants in an amount not to exceed \$10,000,000.

The Applicant-Plaintiffs

BY 

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**ORDER FOR DISCLOSURE OF PROPERTY AND ASSETS**

The foregoing Motion for Pre-Judgment Disclosure of Property and Assets, having been presented to the Court along with probable cause sufficient for the issuance of said pre-judgment remedies,

IT IS HEREBY ORDERED THAT the respondent-defendants disclose to the applicant-plaintiffs within five (5) business days of the date hereof, all properties, real and personal, which the respondents-defendants have an interest, including but not limited to, general and tangibles, bank accounts, business interests, accounts receivable, individual retirement accounts, real property, shares of stocks, bonds, partnership interests, contracts, contractual rights, notes, bills, debts, obligations, and liabilities in whatever form owing, choses in action, tax refunds of any kind to which the defendants are entitled or have any real present or contingent interest.

The disclosure shall be made by:

1. Testimony under oath;

2. Disclosure of documents and evidence revealing the respondents-defendants' assets.

THE COURT,

BY: \_\_\_\_\_  
JUDGE/CLERK

# EXHIBIT A